

# Fact Sheet



## For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on October 31, 2012.

Permit Number: **R30-09900014-2012**  
Application Received: **December 6, 2013**  
Plant Identification Number: **03-54-099-00014**  
Permittee: **Columbia Gas Transmission, LLC**  
Facility Name: **Kenova Compressor Station**  
Mailing Address: **1700 MacCorkle Avenue, SE, Charleston, WV 25314**

Permit Action Number: MM01      Revised: *July 8, 2014*

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Physical Location:	Kenova, Wayne County, West Virginia
UTM Coordinates:	360.9 km Easting • 4,248.0 km Northing • Zone 17
Directions:	Traveling I-64 West from Charleston, take the Kenova-Ceredo exit for US Route 52. Follow US 52 South approximately 2 miles to Route 1 intersection. The station is located on Route 1 near the intersection of Route 1 and Route 52.

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### Facility Description

The Kenova Station is a natural gas transmission and oil and gas production facility covered by Standard Industrial Code (SIC) 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of four (4) 2000-hp and four (4) 1100-hp natural gas fired reciprocating compressor engines, a wastewater evaporation injection system and numerous storage tanks of various sizes. On-site support equipment includes one (1) 500-hp emergency generator, one (1) 6.3 MMBtu/hr heating system boiler and one (1) 1.5 MMBtu/hr line heater. The facility also has a 1,000 gallon mercaptan tank.

This modification is for the replacement of BLR1 (a 0.275 MMBtu/hr Heating system boiler) with BLR2 (a 6.3 MMBtu/hr Boiler).

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Change in Potential Emissions</b>	<b>New Potential Emissions</b>
Carbon Monoxide (CO)	+2.28	801.88
Nitrogen Oxides (NO <sub>x</sub> )	+2.72	1341.32
Particulate Matter (PM <sub>10</sub> )	+0.22	13.5
Total Particulate Matter (TSP)	+0.22	13.5
Sulfur Dioxide (SO <sub>2</sub> )	+0.04	0.4
Volatile Organic Compounds (VOC)	+0.18	44.38
<i>PM<sub>10</sub> is a component of TSP.</i>		
<b>Hazardous Air Pollutants</b>	<b>Change in Potential Emissions</b>	<b>New Potential Emissions</b>
Total HAPs	+0.13	25.07

*Some of the above HAPs may be counted as PM or VOCs.*

## Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 801.88 tons per year of Carbon Monoxide, 1341.32 tons per year of Nitrogen Oxides, 20.50 tons per year of Formaldehyde, and over 25 tons per year of total HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of total HAPs, Columbia Gas Transmission, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	PM limits for Indirect Heat Exchangers
	45CSR13	Construction Permits
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards For Hazardous Pollutants
	40CFR63, Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters
State Only:	45CSR4	No Objectionable Odors

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

### Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2251D	March 25, 2014	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

### Determinations and Justifications

The following changes have been made to the Title V operating permit to incorporate the permit revisions made in R13-2251D.

- In section 1.0 Emission Units and Listing of Applicable Requirements:
  - Removed emission unit BLR1.
  - Added emission unit BLR2 with the applicable requirements of Section 4.0; Section 21.0; R13-2251D (Sections 3.0, 4.1.3, 4.1.4, 4.2.1, 4.4, 4.5); Section 17.0; 45CSR34; 40CFR §§ 63.7545(c), 63.7500(e), 63.7510(g), 63.7540(a)(11), Table 3(2), 63.7550, and 63.7555.
  - Updated the applicable requirements of E05-E08, specifically 40 C.F.R. 63 Subpart ZZZZ.
  - Updated the Applicable Requirements of Emission Units 020G3 and A24 to reflect the changes made in R13-2251D.
  - Removed emission unit FLLP1 because it was removed from the R13 permit with the explanation that the facility can no longer use the flare. Vapor Recovery will be used instead during filling of the mercaptan tank.
- Section 17.0 Boilers and Process Heaters Subject to 40 C.F.R. 63 Subpart DDDDD
  - Removed the existing language and replaced it with language stating that the applicable requirements of 40 C.F.R. 63 Subpart DDDDD are specified in Section 1.0.
- Section 21.0 45CSR13, 45CSR14, and Consent Order Requirements
  - Removed R13-2251C requirements from section 21.0, and placed R13-2251D in Appendix A
- Section 23.0 Permit Shield
  - Removed condition 23.2.n. because there is no exemption for boilers <10mmBtu/hr from 40 C.F.R. 63 Subpart DDDDD.

### Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

45CSR§2-11.1 and 45CSR§10-10.1 exempts Boiler BLR2 from most of the applicable requirements of 45CSR2 and 45CSR10 except for the visible emission standard of 45CSR§2-3.1.

### **Request for Variances or Alternatives**

None.

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date:	Not Applicable for minor modifications.
Ending Date:	N/A

### **Point of Contact**

All written comments should be addressed to the following individual and office:

Robert Mullins  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1243 • Fax: 304/926-0478  
Robert.A.Mullins@wv.gov

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Response to Comments (Statement of Basis)**

Not applicable.